

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
COLUMBIA GAS OF KENTUCKY, INC.)	CASE NO.
FOR AN ADJUSTMENT IN RATES)	2016-00162

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. ("KIUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before September 30, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KIUC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when

made, is now incorrect in any material respect. For any request to which KIUC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, KIUC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to the Direct Testimony of Kevin C. Higgins (“Higgins Testimony”), page 5, line 4, and page 15, lines 7 through 15. Provide support for the amount of 5 percent that is used as a reduction to the average overall increase for the referenced DS, GS/GTO/GDS and IUS rate classes, and for the amount of 2.7 percent that is added to the increase Columbia proposed for residential customers.

2. Refer to the Higgins Testimony, page 5, lines 13–14, which state, “I recommend an alternative that has five blocks, consistent with other gas distribution utilities in the region.”

a. Provide a list of the gas distribution utilities referenced in the statement.

b. Provide a list of any NiSource subsidiaries that offer industrial rate designs with four or more blocks.

3. Refer to the Higgins Testimony, page 10, lines 18–22. Provide the Cost of Service Studies, in Excel spreadsheet format, with all cells unprotected and all sheets visible.

4. Provide Exhibits KCH-3 through KCH-4 to the Higgins Testimony in Excel spreadsheet format, with all cells unprotected and all sheets visible.

5. Provide an average bill comparison similar to page 17 of 25 of Schedule N of Columbia's Application using KIUC's proposed declining block rate design and incremental usage up to 600,000 Mcf. Also provide a comparison of the average bill at Columbia's proposed rates for each block.



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Executive Director
Public Service Commission
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DATED SEP 16 2016

cc: Parties of record

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